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Settlement Deadline: April 1, 2020  
Time: 12:00 pm

Objections Due: March 31, 2020  
Time: 12:00 pm

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,  
Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC  
and for the Estate of Bernard L. Madoff,

Plaintiff,

v.

DEFENDANTS LISTED ON ECF NO. 14283,  
Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

**NOTICE OF SETTLEMENT OF ORDER GRANTING TRUSTEE'S MOTION FOR  
FEES AND EXPENSES PURSUANT TO FED. R. CIV. P. 37(a)(5)(B)**

**PLEASE TAKE NOTICE** that pursuant to this Court's March 20, 2020 decision granting the Trustee's Motion for Fees and Expenses Pursuant to Fed. R. Civ. P. 37(a)(5)(B) (ECF No. 19423) in the above-referenced proceeding, and in accordance with Local Bankruptcy Rule 9074-1(a), the undersigned counsel to Plaintiff Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll, and the chapter 7 estate of Bernard L. Madoff, individually, will present the proposed order, attached hereto as **Exhibit 1** (the "Proposed Order"), to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for settlement and signature on **April 1, 2020**.

**PLEASE TAKE FURTHER NOTICE** that the Trustee provided the Proposed Order to counsel for defendants in the above-referenced proceeding but the Trustee has not received consent from defendants for the filing of the attached Proposed Order.

**PLEASE TAKE FURTHER NOTICE** that any counter-proposed orders and/or objections to the proposed order must be in writing and must be filed with the Clerk of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 by no later than **Noon** on **March 31, 2020** and must be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., and (b) the Securities Investor Protection Corporation, 1667 K St. N.W., Suite 1000, Washington, D.C. 20006 -1620, Attn: Kevin H. Bell, Esq. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the proposed order. Unless a counter-proposed order and/or written objection to the proposed order are received before the objection deadline, the

proposed order may be signed and entered.

Dated: New York, New York  
March 30, 2020

/s/ Nicholas J. Cremona  
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LLC and the Estate of Bernard L. Madoff*

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